

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN DOE,

Plaintiff,

v.

TRUSTEES OF BOSTON UNIVERSITY,

Defendant.

Civil Action No. 1:24-cv-10619-FDS

JOINT MOTION TO EXTEND CASE DEADLINES

Plaintiff John Doe (“Plaintiff”), along with Defendant Trustees of Boston University (“Defendant”) (collectively, the “Parties”) jointly and respectfully request, pursuant to Fed. R. Civ. P. 6(b)(1)(A), an extension of the current deadlines for the completion of discovery. The Parties state that good cause for such an extension exists.

1. Plaintiff commenced this action by filing a Complaint and an *Ex Parte* Motion to Proceed Under a Pseudonym. [ECF Nos. 1, 6-7].
2. The Court granted Defendant’s requests to extend the deadlines to file a response to Plaintiff’s *Ex Parte* Motion to Proceed Under a Pseudonym. [ECF Nos. 14, 16].
3. On June 12, 2024, Defendant filed their opposition to Plaintiff’s *Ex Parte* Motion to Proceed Under a Pseudonym, as well as an Answer to the Complaint. [ECF Nos. 18-19].
4. After the Court granted Plaintiff’s motion to file a reply memorandum of law, Plaintiff filed his reply on June 26, 2024. [ECF Nos. 21-22].
5. On July 15, 2024, the Court entered a scheduling order, setting forth the following deadlines. [ECF No. 29].

Scheduling Order Date	Event
August 5, 2024	Deadline to Exchange Initial Disclosures
November 4, 2024	Status Conference via Telephone
November 11, 2024	Deadline to Amend the Pleadings
January 10, 2025	Deadline to Set Forth Written Discovery Requests
March 31, 2025	Deadline to File a Notice to Call Expert Witnesses
April 9, 2025	Deadline to Complete Fact Discovery and All Depositions (Other Than Expert Depositions)
April 14, 2025	Status Conference via Telephone
June 9, 2025	Deadline to File Dispositive Motions

6. On September 9, 2024, the Court held a hearing regarding Plaintiff's *Ex Parte* Motion to Proceed Under a Pseudonym. [ECF No. 33].

7. On November 6, 2024, the Court granted Plaintiff's *Ex Parte* Motion to Proceed Under a Pseudonym. [ECF No. 37].

8. On February 3, 2025, the Parties appeared for a telephonic status conference. [ECF Nos. 36, 43].

9. On February 6, 2025, the Parties jointly filed a Motion for a Protective Order. [ECF No. 44]. The Court granted the Parties' motion and entered the Protective Order on February 7, 2025. [ECF Nos. 45-46].

10. To date, the Parties have adhered to the scheduling order. [ECF No. 29]. The Parties are engaged in the exchange of documents and continue to supplement their productions as necessary and required, and counsel are diligently and amicably working with one another to address any issues that arise related to the Parties' respective productions.

11. The Parties seek adjournment of the following upcoming deadlines for a period of 90 days and respectfully request the Court adjust the scheduling order as follows:

Event	Current Date	Proposed Date
Deadline to Complete Fact Discovery and All Depositions (Other Than Expert Depositions)	April 9, 2025	July 8, 2025
Deadline to File Dispositive Motions	June 9, 2025	September 8, 2025

12. The Parties seek adjournment of these deadlines for good reason. While the Parties have been actively engaged in the exchange of documents, the Electronically Stored Information (“ESI”) in the possession of the Defendant has returned voluminous results. The Parties require additional time to review the documents for production and discuss a narrowing of the scope of documents identified through the ESI search. Thereafter, the Parties also intend to confirm a deposition schedule, once the documents have been produced, accordingly.

13. Counsel for the Parties remain available for the presently scheduled April 14, 2025 Status Conference to occur telephonically at 3:00 pm.

14. The Parties have not previously requested an extension regarding the foregoing deadlines.

15. Finally, no party will be prejudiced by the Court granting the relief requested herein.

WHEREFORE, the Parties respectfully request that the Court grant this motion and adjust the deadlines as described above.

Dated: Boston, Massachusetts
March 17, 2025

NESENOFF & MILTENBERG, LLP

Counsel for Plaintiff John Doe

By: /s/ Tara J. Davis

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Counsel for Defendant Trustees of Boston University

By: /s/ Victoria L. Steinberg

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CERTIFICATE OF SERVICE

This document was served electronically upon all counsel of record filing through the ECF system on March 17, 2025.

/s/ Tara J. Davis
Tara J. Davis

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

As the Parties have been working diligently to resolve all discovery issues that have arisen, Counsel for the Parties conferred on the motion and have set forth this joint request to extend the case deadlines, accordingly.

/s/ Tara J. Davis
Tara J. Davis